

ERIC L. CRAMER (*pro hac vice*)  
BERGER MONTAGUE PC  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Telephone: (215) 875-3000  
Facsimile: (215) 875-4604  
ecramer@bm.net

JOSEPH R. SAVERI (*pro hac vice*)  
JOSEPH SAVERI LAW FIRM, LLP  
601 California Street, Suite 1200  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
jsaveri@saverilawfirm.com

RICHARD A. KOFFMAN (*pro hac vice*)  
COHEN MILSTEIN SELLERS & TOLL, PLLC  
1100 New York Ave., N.W.,  
Suite 500, East Tower  
Washington, DC 20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408 4699  
rkoffman@cohenmilstein.com

*Counsel for the Class and Attorneys for All  
Individual and Representative Plaintiffs*

[Additional Counsel Listed on Signature Page]

CHRISTOPHER S. YATES (*Pro hac vice*)  
chris.yates@lw.com  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111

WILLIAM A. ISAACSON (*Pro hac vice*)  
wisaacson@paulweiss.com  
JESSICA PHILLIPS (*Pro hac vice*)  
jphillips@paulweiss.com  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006

DONALD J. CAMPBELL  
J. COLBY WILLIAMS  
CAMPBELL & WILLIAMS  
710 South Seventh Street, Ste. A  
Las Vegas, NV 89101  
Telephone: (702) 382-5222  
Facsimile: (702) 382-0540  
Email: djc@cwlawlv.com  
Email: jcw@cwlawlv.com

*Attorneys for Defendant Zuffa, LLC*

[Additional Counsel Listed on Signature  
Page]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

**Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**No.: 2:15-cv-01045-RFB-BNW**

**JOINT MOTION TO CONTINUE  
TO SEAL PORTIONS OF FILED  
DOCUMENTS IN THE RECORD**

1 Pursuant to the Order entered by the Court, ECF No. 847 (“Order Re Sealed Documents”  
2 or the “Order”), Plaintiffs and Defendant Zuffa, LLC (collectively, the “Parties”) respectfully  
3 submit this joint motion to seal portions of the filed record containing information protected by  
4 attorney-client privilege.

5 On August 21, 2023, after the Court informed the Parties that it intended to unseal the  
6 record in this action except for personally identifying information and medical information, the  
7 Court ordered the parties to “jointly file the record with the proposed redactions and to file any  
8 motion requesting additional redactions apart from those concerning the personal identifying  
9 information described above.” ECF No. 847.

10 The Parties have reviewed the full sealed record and identified all documents previously  
11 filed under seal that contain personally identifying information that must be sealed pursuant to  
12 the Order Re Sealed Documents. *See* Joint Mot. to Partially Unseal Record Docs. Containing  
13 Personally Identifying Information. However, the Parties have also identified 14 documents filed  
14 under seal on the basis that they contain or refer to material that the Court has deemed protected  
15 from disclosure pursuant to the attorney-client privilege. *See* Exhibit A (setting forth by docket  
16 entry the 14 documents containing privileged information); *see also* ECF Nos. 264, 270, 353,  
17 359 (finding that the identified documents contain privileged material). In accordance with the  
18 Court’s Order, the Parties hereby request “additional redactions” to these 14 documents when the  
19 Court unseals the record in this action to continue to protect the information the Court has  
20 deemed protected from disclosure on the basis of the attorney-client privilege.

21 To that end, concurrently with this motion, the Parties have filed under seal their  
22 proposed continuing redactions to each docket entry containing privileged information. After the  
23 Court reviews the Parties’ proposed redacted documents, the Parties propose to provide the Court  
24 with copies of all such documents with the redactions implemented, subject to any revisions of  
25 the Court, at a date set by the Court. The Parties propose that the Court may then replace the  
26 current public versions of these documents that require continued redactions with the versions  
27 containing the implemented redactions.

Respectfully submitted,

DATED: December 22, 2023

By: /s/ Christopher K. L. Young

By: /s/ William A. Isaacson

Joseph R. Saveri (*pro hac vice*)  
 Kevin E. Rayhill (*pro hac vice*)  
 Christopher K. L. Young (*pro hac vice*)  
 Itak Moradi (*pro hac vice*)  
 JOSEPH SAVERI LAW FIRM, LLP.  
 601 California St., Suite 1000  
 San Francisco, CA 94108  
 Telephone: +1 (415) 500-6800  
 Facsimile: +1 (415) 395-9940  
 Email: jsaveri@saverilawfirm.com  
 Email: krayhill@saverilawfirm.com  
 cyoung@saverilawfirm.com  
 imoradi@saverilawfirm.com

Eric L. Cramer (admitted *pro hac vice*)  
 Michael Dell'Angelo (admitted *pro hac vice*)  
 Patrick F. Madden (admitted *pro hac vice*)  
 Najah Jacobs (admitted *pro hac vice*)  
 BERGER MONTAGUE PC  
 1818 Market St., Suite 3600  
 Philadelphia, PA 19103  
 Telephone: +1 (215) 875-3000  
 Email: ecramer@bm.net  
 Email: mdellangelo@bm.net  
 Email: pmadden@bm.net  
 Email: njacobs@bm.net

Joshua P. Davis (admitted *pro hac vice*)  
 BERGER MONTAGUE PC  
 505 Montgomery Street, Suite 625  
 San Francisco, CA 94111  
 Telephone: +1 (415) 906-0684  
 Email: jdavis@bm.net

WILLIAM A. ISAACSON (*Pro hac vice*)  
 wisaacson@paulweiss.com  
 JESSICA PHILLIPS (*Pro hac vice*)  
 jphillips@paulweiss.com  
 PAUL, WEISS, RIFKIND, WHARTON &  
 GARRISON LLP  
 2001 K Street, NW  
 Washington, DC 20006

BRETTE M. TANNENBAUM (*Pro hac vice*)  
 btannenbaum@paulweiss.com  
 YOTAM BARKAI (*Pro hac vice*)  
 ybarkai@paulweiss.com  
 PAUL, WEISS, RIFKIND, WHARTON &  
 GARRISON LLP  
 1285 Avenue of the Americas  
 New York, NY 10019

CHRISTOPHER S. YATES (*Pro hac vice*)  
 chris.yates@lw.com  
 LATHAM & WATKINS LLP  
 505 Montgomery Street, Suite 2000  
 San Francisco, CA 94111

SEAN M. BERKOWITZ (*Pro hac vice*)  
 sean.berkowitz@lw.com  
 LATHAM & WATKINS LLP  
 330 North Wabash Ave, Suite 2800  
 Chicago, IL 60611

LAURA WASHINGTON (*Pro hac vice*)  
 laura.washington@lw.com  
 LATHAM & WATKINS LLP  
 10250 Constellation Blvd, Suite 1100  
 Los Angeles, CA 90067

DAVID L. JOHNSON (*Pro hac vice*)  
 david.johnson@lw.com  
 LATHAM & WATKINS LLP  
 555 Eleventh Street NW, Suite 1000  
 Washington, D.C. 20004

Richard A. Koffman (*pro hac vice*)  
 Benjamin Brown (*pro hac vice*)  
 Daniel H. Silverman (*pro hac vice*)  
 COHEN MILSTEIN SELLERS & TOLL, PLLC  
 1100 New York Ave., N.W., Suite 500 East, Tower  
 Washington, DC 20005  
 Telephone: +1 (202) 408-4600  
 Facsimile: +1 (202) 408-4699  
 Email: rkoffman@cohenmilstein.com  
 Email: bbrown@cohenmilstein.com  
 Email: dsilverman@cohenmilstein.com

DONALD J. CAMPBELL (No. 1216)  
 djc@campbellandwilliams.com  
 J. COLBY WILLIAMS (No. 5549)  
 jew@campbellandwilliams.com  
 CAMPBELL & WILLIAMS  
 700 South 7th Street  
 Las Vegas, Nevada 89101

*Attorneys for Defendant Zuffa, LLC*

*Co-Lead Counsel for the Class and Attorneys for  
 Individual and Representative Plaintiffs*

Don Springmeyer (Bar No. 1021)  
 KEMP JONES, LLP  
 3800 Howard Hughes Parkway, 17th Floor  
 Las Vegas, Nevada 89169  
 Telephone: + 1 (702) 385-6000  
 Facsimile: + 1 (702) 385-6001  
 Email: dspringmeyer@kempjones.com

*Liaison Counsel for the Class and Attorneys for  
 Individual and Representative Plaintiffs*

Robert C. Maysey (*pro hac vice*)  
 Jerome K. Elwell (*pro hac vice*)  
 WARNER ANGLE HALLAM JACKSON &  
 FORMANEK PLC  
 2555 E. Camelback Road, Suite 800  
 Phoenix, AZ 85016  
 Telephone: +1 (602) 264-7101  
 Facsimile: +1 (602) 234-0419  
 Email: rmaysey@warnerangle.com  
 Email: jelwell@warnerangle.com

Crane Pomerantz (Bar No. 14103)  
 CLARK HILL PLC  
 1700 S. Pavilion Center Drive  
 Suite 500  
 Las Vegas, NV 89135  
 Telephone: +1 (702) 697-7545  
 Email: cpomerantz@clarkhill.com

*Counsel for the Class and Attorneys for Individual and  
 Representative Plaintiffs.*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Joint Motion to Continue to Seal Portions of Filed Documents in the Record was served on December 22, 2023, via the District Court of Nevada's ECF system to all counsel of record who have enrolled in this ECF system.

/s/ William A. Isaacson  
William A. Isaacson